

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1. BRIAN D. RANDALL,)	
)	
Plaintiff,)	
)	
v.)	Case No. 13-CV-392-TCK-TLW
)	HONORABLE TERENCE KERN
1. SOUTHCREST HOSPITAL)	
IT'S SUCCESSORS AND ASSIGNS)	
2. COMMUNITY HEALTH SYSTEMS)	
3. ARDENT HEALTH SERVICES)	
Defendants.)	

**DEFENDANT COMMUNITY HEALTH SYSTEMS PROFESSIONAL
SERVICES CORPORATION'S MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

COMES NOW Defendant, Community Health Systems Professional Services Corporation ("CHSPSC"), pursuant to FRCP 6(b), and reserving all defenses, respectfully requests that this Court grant an extension of time until December 23, 2013 to submit an Answer or otherwise plead. In support of this Motion, the Defendant would show the Court as follows:

1. Plaintiff filed the above-titled Complaint on June 28, 2013.
2. Plaintiff filed an amended Complaint on July 25, 2013 to name "Community Health Systems" as a defendant.
3. On September 24, 2013, Plaintiff filed a "Proof of Service" stating that he had served "Community Health Professional Services Corp" on June 29, 2013.
4. "Community Health Systems" is not a properly identified entity. Further, CHSPSC was not an identified party to this lawsuit on June 29, 2013 and its registered agent did not receive service on that date.

5. Counsel for CHSPSC has conferred with counsel for Plaintiff on this issue. Counsel for Plaintiff has agreed to file a motion to withdraw his Motion for Default Judgment and Counsel for CHSPSC has agreed to enter an appearance in this matter.
6. Further, Counsel for Plaintiff does not oppose CHSPSC's Motion for Extension of Time to Answer or Otherwise Plead, until December 23, 2013.
7. CHSPSC requests additional time to gather information relating to the allegations in Plaintiff's Complaint so that it may adequately answer said Complaint or otherwise plead.
8. CHSPSC has not made any previous requests for extension of time in this case.
9. Granting this Motion will not impact any deadlines in this case.

RELIEF REQUESTED

WHEREFORE, CHSPSC respectfully requests that the deadline for it to answer or otherwise plead be set at December 23, 2013.

Respectfully submitted,

STRECKER & ASSOCIATES, P.C.

/s/Jessica C. Ridenour

David E. Strecker, OBA #8687
Jessica C. Ridenour, OBA #20758
2150 Mid-Continent Tower
401 South Boston Avenue
Tulsa, Oklahoma 74103-4009
Telephone: (918) 582-1716
Facsimile: (918) 582-1780

**ATTORNEYS FOR DEFENDANT
COMMUNITY HEALTH SYSTEMS
PROFESSIONAL SERVICES CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jeff Nix, OBA #6688
406 S. Boulder
Suite 400
Tulsa, OK 74103
Attorney for Plaintiff

/s/ Jessica C. Ridenour

Jessica Ridenour